



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 25, 2020

BY ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Muge Ma*, 20 Cr. 407 (RMB)

Dear Judge Berman:

As the Court is aware, on August 17, 2020, the defendant Muge Ma was indicted on multiple counts involving major fraud against the United States, bank fraud, wire fraud, false statements, and aggravated identity theft, in connection with a fraudulent scheme to obtain over \$20 million in Government-guaranteed loans designed to provide relief to small businesses during the novel coronavirus/COVID-19 pandemic. The defendant is scheduled to be arraigned next week in Magistrate Court, and Your Honor has scheduled an initial conference on September 11, 2020 at 9:00 a.m.

Over the next several weeks, the Government will be producing a voluminous amount of discovery to the defendant, and the parties have also initiated discussions regarding a potential pretrial disposition of this case. Accordingly, the Government respectfully requests that time be excluded under the Speedy Trial Act until the September 11, 2020 conference in the interest of justice pursuant to 18 U.S.C. § 3161(h)(7)(A), which will allow time for the Government to begin producing discovery and for the parties to continue discussions regarding a potential pretrial disposition of this case. The Government submits that the ends of justice served by the granting

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of this continuance outweigh the best interests of the public and the defendant in a speedy trial. The Government has consulted with defense counsel Peter Katz, Esq., who consents to the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS

Acting United States Attorney

By: 

Sagar K. Ravi

Assistant United States Attorneys

(212) 637-2195

Time is excluded pursuant to the Speedy Trial Act until 9/11/2020 for the reasons set forth in this letter.

SO ORDERED:

Date: 8/26/2020



Richard M. Berman, U.S.D.J.